

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
V.) M.B.D. NO. 05-10114
)
ANTONIO FERREIRA)

JOINT MOTION OF THE PARTIES TO EXCLUDE TIME

Defendant Antonio Ferreira is currently charged by complaint in 05-1034-JGD with obtaining counterfeit immigration and identity documents and related crimes in violation of 18 U.S.C. §§ 1546(a), 1028(a)(6) and (f), and 371. The parties jointly move to exclude an additional 30 days from the time within which the government would otherwise have to obtain an indictment or file an information. Ferreira first appeared before Magistrate Judge Dein on February 17, 2005. The parties are now completing negotiations concerning the specific terms of an agreement which will resolve this criminal proceeding. It is expected that an additional 30 days, commencing on May 27, 2005, and continuing until June 25, 2005, will permit the parties to reach such an agreement before the government is required or inclined to seek an indictment.¹

Consequently, both parties move under 18 U.S.C. § 3161(h)(8)(A), and §5(c)(1)(A) of the Plan for Prompt Disposition of Criminal Cases that this Court find, based on the above, that

¹ A previous motion for excludable delay through May 26, 2005, was allowed on May 4, 2005.

the ends of justice served by granting the requested exclusion outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, exclude the requested 30 days in computing the time within which an information or an indictment must be filed under 18 U.S.C. § 3161(b).

Respectfully submitted,

Antonio Ferreira
by his counsel,

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